



SUSAN K. JAMISON (State Bar No. 131867)  
KATHERINE C. ZARATE (State Bar No. 214922)  
COBLENTZ, PATCH, DUFFY & BASS LLP  
One Ferry Building, Suite 200  
San Francisco, California 94111-4213  
Telephone: 415.391.4800  
Facsimile: 415.989.1663  
Email: ef-skj@cpdb.com,  
ef-kcz@cpdb.com

Attorneys for Defendants  
The Wildcat Vineyards LLC dba  
Sarah's Vineyard

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ROBERTO CELESTINO, GERALDO  
PACHECO, JOSE MONTEJANO AND  
GERALDO M. CELESTINO, individually and  
on behalf of others similarly situated,

Plaintiffs,

v.

THE WILDCAT VINEYARDS LLC DBA  
SARAH'S VINEYARD, AND DOES 1 TO  
10,

Defendants.

Case No. C 08 00994 JW

CLASS ACTION

**JOINT STATUS REPORT AND  
[PROPOSED] ORDER EXTENDING  
DEFENDANT'S TIME TO RESPOND TO  
PLAINTIFFS' COMPLAINT**

The parties jointly submit the following Joint Status Report:

**A. Ongoing Settlement Negotiations**

In this class action lawsuit, plaintiffs Roberto Celestino, Geraldo Pacheco, Jose Montejano and Geraldo M. Celestino ("plaintiffs") assert that defendant The Wildcat Vineyards LLC, dba Sarah's Vineyard ("defendant") owe them, and similarly situated employees, unpaid overtime wages and associated penalties.

Ever since defendant received plaintiffs' complaint, defendant has been diligently investigating plaintiffs' claims, reviewing its time and payroll records, and sharing with plaintiffs

1 such information in a good faith attempt to resolve the parties' dispute amicably and without  
 2 incurring unnecessary litigation costs. The process of evaluating and negotiating a potential  
 3 settlement, however, has taken a considerable amount of time, and the parties jointly request that  
 4 the Court allow additional time for defendant to respond to plaintiffs' complaint in the event the  
 5 parties cannot informally resolve the matter.

6 **B. Time Frame Necessary to Resolve Matter**

7 Defendant intends to continue informally producing documents containing wage and hour  
 8 information to plaintiffs, but needs until the end of May to find, review, and produce relevant  
 9 records, and to sort relevant, non-privileged information from confidential information about  
 10 employees that are not involved, or likely to be involved, in this lawsuit. Plaintiffs, in turn, will  
 11 also need additional time to review and analyze documents provided by defendant. The parties  
 12 anticipate that settlement negotiations will likely continue through the end of June.

13 **C. Request to Extend Time for Defendant to Respond to Plaintiffs' Complaint to**  
 14 **July 11, 2008**

15 The parties jointly request that the Court extend defendant's time to respond to plaintiffs'  
 16 complaint to July 11, 2008 so that defendant can focus on providing plaintiffs with relevant, non-  
 17 privileged documents at this pre-discovery stage in furtherance of the parties' good faith settlement  
 18 negotiations. Extending defendant's time to respond to plaintiffs' complaint July 11, 2008 will not  
 19 impose any extra burden on the Court, because the initial case management conference is not  
 20 scheduled to take place until August 18, 2008, and will save each party unnecessary litigation  
 21 expense.

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **STIPULATED AND AGREED.**

2  
3 DATED: May 15, 2008

LAW OFFICE OF ADAM WANG

4  
5  
6 By: /s/ Adam Wang

Adam Wang

Attorneys for Plaintiffs

Roberto Celestino, Geraldo Pacheco, Jose

Montejano And Geraldo M. Celestino

7  
8  
9 DATED: May 12, 2008

COBLENTZ, PATCH, DUFFY & BASS LLP

10  
11 By: /s/ Katherine C. Zarate

Katherine C. Zarate

Attorneys for Defendants

The Wildcat Vineyards LLC dba

Sarah's Vineyard

12  
13  
14 **SO ORDERED AS MODIFIED BY THE COURT:**

15 Deadline to answer complaint due **July 11, 2008**. Case Management Conference set for  
16 **August 25, 2008 at 10:00 AM**. Joint Case Management Statement due **August 15,**  
17 **2008.**

18 DATED: May 21, 2008

19  
20  
21  
22  
23  
24  
25  
26  
27  
28  


JUDGE OF THE UNITED STATES DISTRICT COURT